

**UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO, LTD;)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,)	
INC.; SAMSUNG SEMICONDUCTOR)	FILED UNDER SEAL
INC.,)	
)	
Defendants.)	

**DECLARATION OF JASON SHEASBY IN SUPPORT OF
PLAINTIFF NETLIST, INC.'S OPPOSITION TO SAMSUNG'S MOTION
FOR RELIEF FROM PROTECTIVE ORDER**

I, Jason G. Sheasby, declare as follows:

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Opposition to Samsung’s Motion for Relief from Protective Order. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and excerpted copy of Netlist’s Objections and Responses to Defendant’s First Set of Requests for Production, dated July 28, 2021, served in *Netlist, Inc. vs. Samsung Electronics Co., Ltd.*, Case No. 8:20-CV-993-MCS (CD Cal).

3. Attached as **Exhibit 2** is a true and excerpted copy of the trial transcript in *Netlist, Inc. vs. Samsung Electronics Co., Ltd.*, Case No. 8:20-CV-993-MCS (CD Cal), dated May 16, 2024.

4. Attached as **Exhibit 3** is a true and excerpted copy of an email chain between Jason Sheasby and Marc Pensabene et al., Re: Netlist v. Samsung – follow up to trial, dated July 2, 2024.

5. Attached as **Exhibit 4** is a true and correct copy of a recurring meeting invitation sent from Raymond Jiang to Netlist and Samsung employees on September 20, 2016, produced in the CDCA Action at Bates Number NL039938.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on July 9, 2024.

By /s/ Jason G. Sheasby
Jason G. Sheasby